

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FCS ADVISORS, LLC,

Plaintiff,

—against—

THEIA GROUP, INC., d/b/a “THORIAN GROUP” and/or “CYPHERIAN”; THEIA AVIATION, LLC; and THEIA HOLDINGS A, INC., d/b/a “THORIAN HOLDINGS,”

Defendants.

21 Civ. 6995 (PKC)

**NOTICE OF MOTION OF STEPHEN BUSCHER
FOR AN ORDER TO LIFT THE RECEIVERSHIP STAY**

PLEASE TAKE NOTICE that upon the accompanying (i) *Memorandum of Law in Support of Stephen Buscher’s Motion to Lift the Receivership Stay* (the “Memorandum of Law”); and (ii) *Declaration of Stephen Buscher* (together with all exhibits thereto, the “Declaration”), Stephen Buscher (“Mr. Buscher”), by and through his undersigned counsel, will move the Court, before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007-1312, for an Order (a) to lift the receivership stay to allow Mr. Buscher to arbitrate his claims relating to the Amended Consulting Agreement¹ and (b) granting such further relief as is appropriate.

¹

Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Memorandum of Law.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court's Order on May 24, 2022 [D.I. 245], opposing affidavits and answering memoranda must be filed by July 22, 2022.

June 24, 2022

**BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP**

By: /s/ Michael J. Barrie
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